

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-203-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF
PLAINTIFF NETLIST, INC.'S MOTION FOR SUMMARY JUDGMENT
THAT THE ASSERTED PATENTS ARE NOT STANDARD ESSENTIAL**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Motion for Summary Judgment that the Asserted Patents Are Not Standard Essential. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpt of JEDEC Manual JM21U.

3. Attached as **Exhibit 2** is a true and correct excerpt of the deposition transcript of Frank Ross, dated August 17, 2023.

4. Attached as **Exhibit 3** is a true and correct excerpt of the deposition transcript of Dave Westergard, dated September 15, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpt of Netlist’s Second Supplemental Responses and Objections to Micron’s First Set of Interrogatories, dated August 17, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpt of the deposition transcript of John Halbert, dated September 30, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of Micron’s Responses and Objections to Netlist’s Second Set of Interrogatories, dated September 5, 2023.

8. Attached as **Exhibit 7** is a true and correct excerpt of the Opening Expert Report of Dr. Harold Stone, dated October 4, 2023.

9. Attached as **Exhibit 8** is a true and correct excerpt of the Rebuttal Report of Dr. Harold Stone, dated October 30, 2023.

10. Attached as **Exhibit 9** is a true and correct excerpt of the Opening Expert Report of John Halbert, dated October 4, 2023.

11. Attached as **Exhibit 10** is a true and correct excerpt of the Rebuttal Expert Report of Dr. Mangione-Smith, dated October 29, 2023.

12. Attached as **Exhibit 11** is a true and correct excerpt of the Deposition Transcript of Katherine Hoang, dated August 10, 2023.

13. Attached as **Exhibit 12** is a true and correct excerpt of the Deposition Transcript of Terry Lo, dated September 1, 2023.

14. Attached as **Exhibit 13** is a true and correct excerpt of the Opening Expert Report of Dr. Mangione-Smith, dated October 4, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby